

meeting was “simple: all of the people against this project, both Indian and non-Indian are Democrats who have a substantially large block of votes and who contribute heavily to the Democratic Party. In contrast, all of the people for this project are Republicans.”<sup>755</sup>

Not long after the meeting at the DNC, opponent lobbyist Patrick O’Connor spelled this out clearly for White House Deputy Chief of Staff Harold Ickes (who in the interim had been contacted by Fowler about Hudson): “All of the representatives of the tribes that met with Chairman Fowler are Democrats and have been so for years. I can testify to their previous financial support to the DNC and the 1992 Clinton/Gore Campaign Committee.”<sup>756</sup> Indeed, there is evidence indicating that the opponent lobbyists contemplated and attempted to make a “financial support” pitch directly to high-level officials at Interior overseeing the Hudson matter.<sup>757</sup>

Notwithstanding this ample evidence of the opponent tribes’ attempted use of campaign contributions to further their efforts, there is little evidence to suggest the existence of a *quid pro quo* relating to the outcome of the Hudson application. There is no evidence that anyone at the DNC or the White House communicated to the opponent tribes that the outcome of the Hudson matter depended upon the tribes’ willingness to make campaign contributions. In addition, there

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<sup>755</sup>“Minnesota Legislative Update,” from Larry Kitto to Tribal Clients, April 17-21, 1995.

<sup>756</sup>Letter from Patrick O’Connor to Harold Ickes, May 8, 1995.

<sup>757</sup>Opponent representative Thomas Corcoran told investigators that, during a meeting he attended on March 15, 1995, at Interior with Interior Chief of Staff Thomas Collier and Special Assistant to the Secretary Heather Sibbison, O’Connor and Kitto told Collier and Sibbison that the tribes they represented were “good Democrats” – a phrase that Corcoran understood to be “code” referring to financial campaign contributors. *See* Section II.D.3, *supra*.